



STATE OF WASHINGTON
OFFICE OF THE STATE HUMAN RESOURCES DIRECTOR

DIRECTOR'S REVIEW PROGRAM
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October 24, 2011

TO: Teresa Parsons, SPHR
Director's Review Program Supervisor

FROM: Kris Brophy, SPHR
Director's Review Program Investigator

SUBJECT: Rickey Blank v. PARKS
Allocation Review Request ALLO-11-013

Director's Determination

This position review was based on the work performed for the six-month period prior to January 3, 2011, the date PARKS Human Resources (PARKS-HR) received Mr. Blank's request for a position review. As the Director's Review Program Investigator, I carefully considered all of the documentation in the file, the exhibits presented during the Director's review conference, and the verbal comments provided by both parties. Based on my review and analysis of Mr. Blank's assigned duties and responsibilities, I conclude his position is properly allocated to the Park Ranger 3 classification.

Background

On January 3, 2011 PARKS-HR received Rickey Blank's Classification Questionnaire (CQ) form, asking that his position be reallocated to the Park Ranger 4 class (Exhibit B-5).

PARKS conducted a review of Mr. Blank's duties and responsibilities and by letter dated March 1, 2011, notified Mr. Blank that his position was properly allocated to the Park Ranger 3 classification (Exhibit B-4).

On March 22, 2011, the Department of Personnel received Mr. Blank's Director's Review form requesting a Director's review of PARK's allocation determination (Exhibit A).

On September 6, 2011, I conducted a Director's review conference. Present during the conference were Rickey Blank; Phyllis Naiad, WFSE, Council Representative; Joe Vidales, Human Resource Consultant, PARKS; and George Price, Human Resource Consultant, PARKS. Ms. Allison Alderman, NW Region Operations Manager, participated by telephone.

Mr. Vidales submitted additional exhibits following the review telephone conference. This information was submitted on September 6, 2011. This information has been added to the

record and incorporated as exhibits to the file. On October 13, 2011, Ms. Naiad confirmed that Mr. Blank had no additional comment or response to that information.

Rationale for Director's Determination

The purpose of a position review is to determine which classification best describes the overall duties and responsibilities of a position. A position review is neither a measurement of the volume of work performed, nor an evaluation of the expertise with which that work is performed. A position review is a comparison of the duties and responsibilities of a particular position to the available classification specifications. This review results in a determination of the class that best describes the overall duties and responsibilities of the position. Liddle-Stamper v. Washington State University, PAB Case No. 3722-A2 (1994).

Duties and Responsibilities

Mr. Blank assists Mr. Jack Hartt, the designated Park Manager at Deception Pass State Park (DPSP). Mr. Blank is the assistant manager, responsible for overseeing the daily operations of the park. His duties include supervising eight park rangers, managing program activities and operations, administering the fiscal program, and managing other administrative and operational activities including purchasing, planning, and public safety. He also coordinates with the park's Chief Maintenance supervisor regarding general maintenance and other construction activities.

Mr. Blank describes his duties and responsibilities in the CQ as follows:

- 35% Administration: I administer the fiscal program and am responsible for the park's audit and security of assets program. I implement policies and procedures to insure that the best possible service is provided to park patrons while maintaining fiscal accountability. I assist in park budgeting and accounting, including maintaining open account funds, credit card, petty cash, and utilities expenditures. I oversee the inventory of records and non-expendable items. I complete and prepare daily, weekly, monthly, and annual reports such as attendance, utilities, resource tracking, purchasing requisitions, "Fast Track" accounting, cash-receipt transmittals, and timesheets. I collect fees as required. I solicit funding through donations in cooperation with educational, community, and service organizations for specific park projects and programs.
- 20% Supervision: I supervise eight Park Ranger 2's including recruitment, hiring, training, setting expectations, evaluating and taking corrective action. I direct, organize, schedule, plan and control assigned resources such as personnel, time, materials, and programs. I monitor the efficiency of staff time, utilities, and equipment.
- 10% Maintenance: I actively and effectively participate in a program of construction and maintenance of park structures, camp sites, water and sanitary systems, marine areas, recreational, picnicking, interpretation and other park activities. I help oversee project and contract work. I understand and follow applicable laws, regulations, and other standards to establish and/or maintain a safe work environment.
- 10% Visitor Protection: As a commissioned law enforcement officer, it is my [sic] to recognize and respond to acts which threaten visitor safety and endanger park resources as they occur. Even while engaged in other duties, I am performing this function at all times through surveillance and mere presence. I provide routine patrols, issue citations and notices of infraction, make arrests, perform transports and bookings, conduct search and

seizure, rescue and body retrieval, investigations, court appearances, fire suppression, first aid, CPR & AED, waterfront and marine enforcement pertaining to boating, fish and shellfish, wildlife enforcement. I write required case, incident, use of force, accident, and fire reports. I use and maintain agency-issued uniforms, law enforcement equipment, radio, and vehicle. I receive training as required to maintain and improve necessary skills.

- 5% Public relations: I effectively communicate with and disseminate information to the public. I establish and maintain cooperative relations with the general public, user groups, contractors and officials of other public jurisdictions. I demonstrate tact, diplomacy, organizational and political awareness.
- 5% Interpretation: I develop, implement and deliver interpretive programs for the public. I give formal and informal thematic presentations to large or small groups. I effectively influence others to achieve understanding, acceptance and commitment to act in support of programs, ideas or causes.
- 5% Stewardship: I protect park cultural, historic and natural resources by identifying and mitigating threats and work to improve public understanding of their impacts on these resources. I preserve and enhance these resources to established best practices.
- 5% Special Programs: I recruit volunteers for park specific projects and programs. I oversee the camp host program.
- 5% Performs other duties as assigned.

During the review conference Mr. Blank clarified he is in charge of the registration and maintenance of accounting records and documents for the State's new Discover Pass. He stated he is the head purchasing agent for Deception Pass, and clarified his budget management responsibilities for the following:

- Managing the \$100,000 Coronet Bay State Park budget.
- Managing the \$24,000 firewood budget.
- Co-managing the 50503 revenue account which is approximately \$26,500 for day-to-day maintenance. Mr. Blank stated he co-manages this budget with Jack Hartt and the Chief Maintenance supervisor.
- Managing the 33207, 33208 deferred maintenance accounts of \$33,050 with Jack Hartt and the Chief Maintenance supervisor.
- Managing the 525A-P2A account with approximately \$18,000 from visitor donations. Mr. Blank stated park staff work in consensus to determine where to use this money.

Mr. Jack Hartt, Park Manager (WMS) for DPSP and Mr. Blank's supervisor, completed the supervisor's section of the CQ. Mr. Hartt indicates Mr. Blank's description of his duties and responsibilities are accurate and complete, with the exception of a small correction to Section 26 noting that Mr. Blank supervises a total of eight park rangers.

Mr. Hartt fully supports Mr. Blank's request to be reallocated to the Park Ranger 4. In his letter (Exhibit B-6), Mr. Hartt states that Mr. Blank serves as the assistant manager at the park and performs his duties at the expert level. He states Mr. Blank must:

“supervise eight rangers, co-manage a budget of nearly 1.5 million dollars, oversee the operations of a park that features over 100 buildings, 20 restrooms, hundreds of campsites, and 600 picnic sites spread across 4000 acres, protect and control over 2.5 million visitors, account for revenue of almost a million dollars, supervise a retreat center that houses up to 180 people on any given night, while providing exceptional customer service, maintenance, interpretation and law enforcement services (at a park that experienced over 300 incidents this past year).”

Mr. Hartt states he understands that, “because this Ranger 3 is not the park manager, the position does not carry all of the weight that a manager position carries. However, comparing the duties and workloads, I can state emphatically that this Ranger 3 has far more responsibility than [other] manager positions [at other parks].” He also states Mr. Blank’s, “Park Ranger 3 position in particular stands out as having extraordinary responsibilities, requiring far greater expertise, and...due greater compensation than the Park Ranger 3 level.”

Summary of Mr. Blank's Perspective

Mr. Blank stated during the review conference that he has been delegated responsibility for managing the day-to-day operations of the park. Mr. Blank asserts he works at the expert level because of the size and complexity of operations, because of his years of experience, and because of his ability to handle problems for the largest park in the system.

Mr. Blank argues he works at the expert level given the level of complexity required to manage the Park’s administrative functions which include: maintaining a large operating budget, developing and maintaining tracking systems for a high volume of guest pass, registration, visitor records and other information; maintaining complex accounting forms and records; managing contracts; serving as the head purchasing agent for the park; overseeing the activities of concessionaires to ensure compliance, and supervising the largest number of park ranger staff in the state park system. Mr. Blank further asserts he has served as an expert in various capacities including serving on various regional and agency-wide special projects, interpretive committees, Camp Program, and other functions.

Mr. Blank asserts the Park Management Position Allocation System is antiquated and does not adequately address size, scope, and level of responsibility required to operate and manage DPSP, and therefore should not be used as the primary allocating criteria in determining park ranger position allocations.

In total, based on his expertise and level of responsibility for managing park operations, Mr. Blank asserts his position should be allocated to the Park Ranger 4 classification.

Summary of PARK's Reasoning

PARKS contends the Class Series Concept for the Park Ranger series requires allocation to levels within the series based solely upon the assignment of points by the Park Management Position Allocation System. Based on that system, DPSP is classified as a Class 6 State Park. PARKS asserts that the Park Ranger 4 class requires managing a Class 5 or 6 State Park or serving as a principal assistant to a Regional Manager. PARKS asserts Mr. Blank does not have this level of responsibility.

PARKS stated during the review conference that Mr. Hartt has responsibility for managing DPSP, which includes having primary responsibility for planning and development. Additionally,

PARKS asserts that while Mr. Blank assists the park manager by managing operations, he is not fully in charge of all operations. PARKS asserts Mr. Hartt retains management responsibility for construction and maintenance activities through the park's chief maintenance supervisor. Therefore, PARKS contends Mr. Blank's position duties, and scope and level of management responsibilities do not meet the requirements of the Park Ranger 4 class of managing a class 5 or 6 State Park.

PARKS acknowledges Mr. Blank is a highly valued employee and performs his duties well. However, based on the allocating criteria required by the Park Ranger series and the duties and responsibilities to serve as a principal assistant to the manager of a Class 5 or 6 State Park, PARKS asserts the Park Ranger 3 class is the proper allocation for his position.

Class Specifications

When comparing the assignment of work and level of responsibility to the available class specifications, the Class Series Concept (if one exists) followed by the Definition and Distinguishing Characteristics are primary considerations. While examples of typical work identified in a class specification do not form the basis for an allocation, they lend support to the work envisioned within a classification.

Comparison of duties to the Park Ranger series

In Broad v. Washington State Parks and Recreation Commission, PRB Case No R-ALLO-09-037, the Board stated in part that,

Consideration is also given to allocating criteria specifically developed for a class series provided that the criteria are referenced in the classification specifications. In this case, the parks point system, also known as the Park Management Position Allocation System, is referenced in the class series concept for the Park Ranger series. The class series concept states:

Positions in this series administer, operate, and maintain a state park or a park area. Positions provide interpretation of federal and state rules and regulations and provide assistance to park visitors. Positions provide education, visitor services and law enforcement. Positions in all class levels may be required to lead or supervise less trained or lower-level staff.

Allocation to this occupational category and levels is determined by the assignment of points by the Park Management Position Allocation System.
(Emphasis added).

The PRB further stated:

. Both parties agree that the Park Management Position Allocation System is in need of revision. However, until revisions are adopted, the existing system is the allocating standard that must be adopted.

Comparison of Duties to the Park Ranger 4 class

The Definition for the Park Ranger 4 class states:

This is the supervisory or expert level of the series. Positions at this level typically manage a Class 5 or Class 6 State park or park area developing, controlling and accomplishing all program activities for a parks [sic] or park areas in non-contiguous locations. Positions may serve as the principal assistant to a Regional Manager in the administration, development, maintenance, visitor services and law enforcement of State parks or park areas in an assigned Region.

The DOP Glossary of Classification terms defines expert as:

Within the context of the class series, has the highest level of responsibility and extensive knowledge based on research and experience in a specific area. Resolves the most complex, critical, or precedent-setting issues that arise.

Positions act as a resource and provide guidance on specialized technical issues. Although an employee may be considered by their peers as an expert or "go-to" person at any level, for purposes of allocation, the term is typically applied to an employee in a higher class level who has gained expertise through progression in the series.

Mr. Blank's position does not meet the requirements of the Definition for this class.

Mr. Blank's position does not meet the primary allocating criterion for allocation to the Park Ranger 4 class of managing a Class 5 or 6 Park. It is undisputed the Park Management Allocation system designates DPSP as a Class 6 park. However, Mr. Hartt is the Park Manager for DPSP. Mr. Hartt retains overall management responsibility for DPSP. Therefore, Mr. Blank does not manage a Class 5 or 6 Park as required by the Definition of this class.

Mr. Blank does not serve as a principal assistant to a regional manager. Mr. Blank serves as a principal assistant to the designated Park Manager for DPSP, Mr. Hartt. During the review conference, Ms. Allison Alderman indicated she is the NW Region Operations Manager. She stated her position establishes policy direction which is passed on to Park Managers who are responsible for interpreting and translating executive policy into management of their parks. She stated Jack Hartt takes the executive policy direction he receives and applies it to the management of DPSP. She confirmed Mr. Blank serves as the principal assistant to Mr. Hartt at DPSP.

Therefore, while Mr. Blank serves as a principal assistant to a State Park Manager, he does not serve as the principal assistant to a Regional Manager involved in the administration, development, maintenance, visitor services and law enforcement of State parks or park areas in an assigned Region.

Additionally, Mr. Blank's duties do not involve performing expert work at the level described by this class. Mr. Hartt retains responsibility for managing DPSP. This includes overall management responsibility for developing, controlling and accomplishing all program activities for the park. While it is true Mr. Blank assists the park manager by managing daily operations, he is not fully in charge of all operations. For example, Mr. Hartt manages the park's major construction and maintenance activities through the park's chief maintenance supervisor.

Therefore, when looking at his level of his responsibility as a whole, Mr. Blank does not exercise management responsibility for the park. Therefore, Mr. Blank's position duties and level of management responsibility do not meet the expert level scope of responsibility required by the Park Ranger 4 class.

For these reasons, Mr. Blank's position should not be reallocated to the Park Ranger 4 class.

Comparison of Duties to Park Ranger 3.

The Definition for this class states:

This is the senior level of the series. Positions at this level typically have one of the following assignments:

- Responsibility for the management and operations of a Class 3 or Class 4 park or park area.
- Serve as the principal assistant of a Class 5 or Class 6 State Park or park area in developing, controlling, and accomplishing all activities for a group of parks in non-contiguous locations.

The DOP Glossary of Classification terms defines senior level as:

Senior - The performance of work requiring the consistent application of advanced knowledge and requiring a skilled and experienced practitioner to function independently. Senior-level work includes devising methods and processes to resolve complex or difficult issues that have broad potential impact. These issues typically involve competing interests, multiple clients, conflicting rules or practices, a range of possible solutions, or other elements that contribute to complexity. The senior-level has full authority to plan, prioritize, and handle all duties within an assigned area of responsibility. Senior-level employees require little supervision and their work is not typically checked by others.

Mr. Blank's position closely matches the Definition of this class. Mr. Blank serves as the principal assistant to the manager of a Class 6 State Park. He supervises eight park rangers and relieves the park manager of responsibility for managing daily operations. The scope of his duties and the level of responsibility assigned to his position fully meet the requirements of serving as a principal assistant to the manager of a Class 6 park.

The primary thrust of Mr. Blank's position is to provide senior level management and supervision of DPSP's daily operations. During the review conference, Mr. Blank stated he has delegated responsibility from Mr. Hartt to take care of the day to day operations of the park. He has full authority to plan, prioritize, and handle all duties within his assigned area of responsibility. This includes prioritizing and scheduling work, and developing task and job lists for staff.

Further, given the size and scope of operations associated with DPSP, Mr. Blank has a broad list of responsibilities which often require applying his advanced knowledge and skill as an experienced park ranger to develop new methods and processes to resolve complex or difficult issues that arise. For example, during the review conference, Mr. Blank discussed his responsibility for developing an internal records tracking and monitoring process for the new visitor Discover Pass system.

Mr. Blank's level of responsibility includes addressing operational and administrative issues which often involve competing interests, multiple clients, and often involve a wide range of possible solutions, or other elements that contribute to the complexity of park operations. For example, during the review conference, Mr. Blank discussed his involvement regarding the removal of three old growth trees that needed to be cut down due to safety issues. During his manager's absence, Mr. Blank independently determined the budget and appropriate action steps needed to remove the trees safely, and worked through the regional director's office for budgetary approval.

Therefore, the overall scope and level of responsibility assigned to Mr. Blank's position closely matches the requirements of the definition of this class.

Further, although the Typical Work examples do not form the basis for an allocation, they lend support to the work envisioned within a classification. The following includes examples of the level of work assigned to the Park Ranger 3 class, as stated in the class specification:

...

Collects and accounts for charges; manages the maintenance and operating funds allocated to the park;

Trains park personnel, evaluates their performance and recommends appropriate action;

Represents agency at various meetings and gatherings; by direction, gives speeches where required;

Receives and adjusts complaints; writes letters; assists in gathering of information for park usage and trends.

The examples listed above are consistent with the level and scope of work assigned to Mr. Blank's position, as stated in the CQ regarding his assigned job duties. Mr. Blank maintains a large operating budget, maintains complex accounting forms and records; manages contracts; serves as the head purchasing agent; oversees concessionaire activities, and serves on various regional and agency-wide special projects, interpretive committees, Camp Program, and other functions.

The purpose of an allocation review is to determine the classification which best describes the overall duties and level of responsibility of a position. In Salsberry v. Washington State Parks and Recreation Commission, PRB Case No. R-ALLO-06-013 (2007), the Personnel Resources Board addressed the concept of *best fit*. The Board referenced Allegri v. Washington State University, PAB Case No. ALLO-96-0026 (1998), in which the Personnel Appeals Board noted that while the appellant's duties and responsibilities did not encompass the full breadth of the duties and responsibilities described by the classification to which his position was allocated, on a best fit basis, the classification best described the level, scope and diversity of the overall duties and responsibilities of his position.

Further, a position's allocation is not a reflection of performance or an individual's ability to perform higher-level work. It is clear Mr. Blank is highly-skilled and dedicated member of PARK's staff. However, a position allocation is based on the majority of work assigned to a position and how that work best aligns with the available job classifications. Given the overall level, scope and diversity of Mr. Blank's duties and responsibilities, including the performance of complex, senior-level work, his position is properly allocated to the Park Ranger 3 class.

Appeal Rights

RCW 41.06.170 governs the right to appeal. RCW 41.06.170(4) provides, in relevant part, the following:

An employee incumbent in a position at the time of its allocation or reallocation, or the agency utilizing the position, may appeal the allocation or reallocation to . . . the Washington personnel resources board Notice of such appeal must be filed in writing within thirty days of the action from which appeal is taken.

The mailing address for the Personnel Resources Board (PRB) is P.O. Box 40911, Olympia, Washington, 98504-0911.

You may file in person at 521 Capitol Way South, Olympia, Washington. Fax number (360) 586-4694.

For questions, please call (360) 664-0388.

If no further action is taken, the Director's determination becomes final.

c: Rickey Blank, PARKS
Phyllis Naiad, WFSE
Jose Vidales, PARKS
Lisa Skriletz, DOP

Enclosure: List of Exhibits

RICKEY BLANK v PARKS

ALLO-11-013

Exhibit List

A. Rickey Blank Exhibits

Request for Director's Review form, received March 22, 2011 with attached allocation determination letter from Jose Vidales to Rickey Blank, dated March 1, 2011 (5 pages) with additional attachments:

1. Classification Questionnaire for Rickey K. Blank, position 0249, dated March 2005 with attached organization chart (4 pages)
2. PDP Expectations for Rick Blank for period February 1, 2011 to January 31, 2012 (7 pages)
3. PDP Expectations for Rick Blank for period February 1, 2010 to January 31, 2011 (5 pages)
4. Essential Functions Analysis document dated December 1, 2010 (3 pages)
5. PDP Expectations for Rick Blank for period February 1, 2009 to January 31, 2010 (4 pages)
6. PDP Evaluation for Rick Blank for period February 1, 2008 to January 31, 2009 (2 pages)
7. WSPRC Park Management Position Allocation System for summary year 1997 (7 pages)

Additional exhibits submitted during review conference:

8. Budget document titled, "SW Region Allotments--By Park"
9. Park Points allotment document with handwritten date of March 24, 2000 (Note: This was not adopted)
10. DOP Glossary of Classification Terms definition of "Expert"

B. Cover letter from Jose Vidales to Karen Wilcox dated April 12, 2011 with attachments:

1. DOP Class Specification for Park Ranger 1 with highlighted class series concept
2. DOP Class Specification for Park Ranger 3 with highlighted definition
3. DOP Class Specification for Park Ranger 4 with highlighted definition
4. Allocation determination letter from Jose Vidales to Rickey Blank dated March 1, 2011 (3 pages)
5. Classification Questionnaire for Rickey Blank, position 0249, received by PARKS HR on January 3, 2011 (3 pages)
6. Letter of support from Jack Hartt, Park Manager, dated December 11, 2009 (3 pages)
7. PARKS response statement to letter of support submitted by Jack Hartt
8. Organizational Chart for Deception Pass State Park
9. Copy of PRB decision, Robert Broad v PARKS R-ALLO-09-037 (7 pages)

Additional exhibits submitted prior to review conference:

10. PARKS response to Mr. Blank's exhibits 1-7, dated May 18, 2011 with attachment:
 - a. Classification Questionnaire for Rickey Blank, received by PARKS–HR May 25, 2005 (3 pages)

Additional exhibit submitted following review conference:

11. WMS position description for Jack Hartt, Park Manager, Deception Pass Area
12. PDP Expectations for Jack Hartt for period February 1, 2010 to January 31, 2011 (4 pages)

C. Class Specifications

1. DOP Class Specification for Park Ranger 1, (389A)
2. DOP Class Specification for Park Ranger 3 (389C)
3. DOP Class Specification for Park Ranger 4 (389D)